

## Schary, Claire

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**From:** Carrie Sanneman [sanneman@willamettepartnership.org]  
**Sent:** Thursday, September 26, 2013 3:56 PM  
**To:** Schary, Claire  
**Cc:** Bobby Cochran  
**Subject:** Re: Comments on the JRA Oct. agenda

Hi Claire,

I agree, let us know what you come up with. It's hard to imagine they will suggest something meaningful if we continue on the current trajectory. As for the role of pilot projects within the agenda, our feeling was that the group discussions haven't been very effective in terms of getting states to really think about and begin committing to pilot projects. We are planning to begin working with each agencies through individual meetings at their offices and use the full group time to keep everyone informed and look for ways that the pilots can connect or help each other.

Carrie

On Thu, Sep 26, 2013 at 3:29 PM, Schary, Claire <[Schary.Claire@epa.gov](mailto:Schary.Claire@epa.gov)> wrote:

Forgot to answer your question about the pilot projects. I am also having a meeting with Christine and Laurie Mann about Ecology's reluctance to have a pilot project and see if we can suggest some to consider. We need a place to direct stakeholder input on trading and for one state to not have a pilot project in mind will be very unfortunate. I think we need to keep the momentum going on this project, including the cross-state dialog, so learning from each other's pilot projects are a good way to do that.

-- Claire

**Claire Schary**

[schary.claire@epa.gov](mailto:schary.claire@epa.gov) / [\(206\) 553-8514](tel:(206)553-8514)

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**From:** Bobby Cochran [mailto:[cochran@willamettepartnership.org](mailto:cochran@willamettepartnership.org)]

**Sent:** Thursday, September 26, 2013 3:15 PM  
**To:** Schary, Claire; Carrie Sanneman  
**Subject:** Re: Comments on the JRA Oct. agenda

Good comments Claire, thanks. Had some questions for you.

Looking at Chae's comments on the permit content, why do you think we need to talk about that more? He seemed really clear and straightforward.

I'm also curious on your thoughts around pilots. I like the idea of talking about check-ins and ongoing interaction of the group. At the Boise meeting, we left with the impression that a full group discussion of pilots wasn't going to be that fruitful--that each state really needs to be encouraged to come up with what they want. We totally open to shifting that around if you think there's value.

We'll also be distributing a writeup of the mock transaction with the materials.

Thanks Claire!

Bobby

On Thu, Sep 26, 2013 at 3:00 PM, Schary, Claire <[Schary.Claire@epa.gov](mailto:Schary.Claire@epa.gov)> wrote:

Bobby & Carrie,

I agree with Marti's comments (below) about the need to talk explicitly about what goes into a permit, and how it will meet compliance and enforcement concerns. I'm also not clear why each state's permits are different on how they refer to the permittee's use of credits – i.e., referring to the state's trading guidance directly for most of the detail about credit verification, reporting, etc. versus requiring a full trading plan be submitted with each permit.

Baseline is a topic we may never get a full resolution on because of its relationship to the larger, seemingly intractable, TMDL issues, but I agree that it needs more discussion.

It's not clear to me how the mock trade will be laid out to make sure we get through a discussion of all the elements that are important to the permitting authority and not just the buyer and seller. It would probably help to have the mock trade outlined in the discussion materials you distribute before the meeting so that we can tell you where we want more clarification or see an issue that hasn't been resolved.

Finally, the pilot project discussion is not scheduled until the very end and only for 45 minutes. I thought there would be a longer discussion about how this group would participate in the pilot projects – at least, what are our preferences

for reporting regularly on progress and sharing learnings as we go. Also how will the draft best practices document be characterized after this meeting – i.e., a document that remains in that draft form until the completion of the projects, or something more fluid, to capture other approaches that emerge as the pilot projects go forward?

Despite all of these comments, I defer to your good judgment on how to lay out an agenda that gets through all the topics you need covered.

I've copied my EPA team on this message, in case my comments inspire them to provide any additional thoughts.

-- Claire

**Claire Schary**

[schary.claire@epa.gov](mailto:schary.claire@epa.gov) / (206) 553-8514

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**From:** [Marti.Bridges@deq.idaho.gov](mailto:Marti.Bridges@deq.idaho.gov) [mailto:[Marti.Bridges@deq.idaho.gov](mailto:Marti.Bridges@deq.idaho.gov)]  
**Sent:** Thursday, September 26, 2013 1:02 PM  
**To:** [sanneman@willamettepartnership.org](mailto:sanneman@willamettepartnership.org); [Mark.Shumar@deq.idaho.gov](mailto:Mark.Shumar@deq.idaho.gov); [Michael.Mcintyre@deq.idaho.gov](mailto:Michael.Mcintyre@deq.idaho.gov); [Darcy.Sharp@deq.idaho.gov](mailto:Darcy.Sharp@deq.idaho.gov); [FOSTER.Eugene@deq.state.or.us](mailto:FOSTER.Eugene@deq.state.or.us); [hbre461@ECY.WA.GOV](mailto:hbre461@ECY.WA.GOV); [mgil461@ECY.WA.GOV](mailto:mgil461@ECY.WA.GOV); [NOMURA.Ranei@deq.state.or.us](mailto:NOMURA.Ranei@deq.state.or.us); [michie.ryan@deq.state.or.us](mailto:michie.ryan@deq.state.or.us); Schary, Claire  
**Cc:** [Cochran@willamettepartnership.org](mailto:Cochran@willamettepartnership.org); [Furia@thefreshwatertrust.org](mailto:Furia@thefreshwatertrust.org); [Karin@thefreshwatertrust.org](mailto:Karin@thefreshwatertrust.org); [nmullane@msn.com](mailto:nmullane@msn.com); [Tim@thefreshwatertrust.org](mailto:Tim@thefreshwatertrust.org); [TGartner@wri.org](mailto:TGartner@wri.org)  
**Subject:** RE: Agenda for review by 9/27, meeting summary for review by 10/4

Carrie et al:

I think we need some additional discussion on how much needs to go into a permit. Since I'm of the view that many facilities may not know what kind of trade project they will do to offset their permit limits, I'm extremely leery of micromanaging that in the permit context necessarily. It doesn't lend itself at all to the concept of free market trading. That said, I also recognize that the level of detail then needs to be captured somewhere else, and that may vary from state to state. So that's my other agenda item for discussion.

I'm also curious if Washington and Oregon have thought about what practices they will pilot? I know I voiced the notion on behalf of Idaho that we would find it desirable to work with EPA on how a trading permit might look for a mock situation, likely TP in the Lower Boise, since that's what is waiting at the back door.

The remainder of the agenda looks fine. Baseline is a huge issue over here on the Lower Boise so some mutual agreement we can all live with would be nice, actually.

I'm responding on behalf of me and Michael McIntyre, so you won't get a separate response from him as he is out of the office.

Marti Bridges

TMDL Program Manager

IDEQ

[208-373-0382](tel:208-373-0382)

**From:** Carrie Sanneman [<mailto:sanneman@willamettepartnership.org>]

**Sent:** Wednesday, September 25, 2013 2:19 PM

**To:** Mark Shumar; Marti Bridges; Michael McIntyre; Darcy Sharp; FOSTER Eugene P; Helen Bresler; Melissa Gildersleeve (ECY); Ranei Nomura; Ryan Michie; Schary, Claire

**Cc:** Bobby Cochran; Joe Furia; Karin Power; Neil Mullane; Tim Wigington; Todd Gartner

**Subject:** Agenda for review by 9/27, meeting summary for review by 10/4

Hi all,

I hope everyone is enjoying the fall weather, all the better for staying inside and reviewing documents! I have a couple very short ones for you today (with correspondingly short review schedules), attached are:

1. **Draft meeting summary for workshop #3** - please review by *next Friday, October 4th* and provide comments so that we can post a version that accurately reflects our discussion.
2. **Draft agenda for workshop #4** - please review by *this Friday, September 29* and provide comments on the plan for our next gathering. We set this one up to revisit some issues that we know need more work (Baseline) and to walk through a mock trade that represents our best practices so far, which should help clarify what they all are and how they fit together. We're anticipating that this will also jog our collective memories about other issues that we need to revisit, so we've built in time to discuss them as they arise.

These will be posted on the the project wiki site shortly.

Best,

Carrie